

Jeremy Johnson



Bob Holden, Governor • Stephen M. Mahfood, Director

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176 Jefferson City, MO 65102-0176

June 4, 2001

CERTIFIED MAIL – Z 290 178 990
RETURN RECEIPT REQUESTED

REC'D

JUN 29 2001

RCAP

Mr. Joseph Haake
Group Manager
The Boeing Company
Dept. 464C, Bldg. 220
Mail Code S221-1400
P.O. Box 516
St. Louis, MO 63166-0516

RE: Comments on the RCRA Facility Investigation (RFI) Work Plan Addendum II for
The Boeing Company (Boeing), Hazelwood, Missouri; Permit #: MOD000818963

Dear Mr. Haake:

The Missouri Department of Natural Resources' Hazardous Waste Program (HWP) has completed review of the RFI Work Plan Addendum II dated April 20, 2001, for the supplemental field investigation of SWMU 17. The department's HWP has several comments that must be addressed by Boeing prior to granting approval of the RFI Work Plan Addendum II.

COMMENTS

1. The report indicates that Figure 1-2 displays the locations of the SWMUs being investigated in the RFI, but there are no SWMUs labeled in this figure.
2. Drilling Logs/Well Construction Diagrams for the wells and borings that were completed during previous investigations in this area were not included in the work plan in support of newly proposed sampling locations and depths.
3. During a recent site visit it was noticed that on the west side of the building there was an outside shelter for 55-gallon drums. There was an area the diameter of the bottom of 1 drum where the asphalt had disintegrated. It appears this may relate to a release from a drum or drums and could represent a contaminant source area. As such it may be prudent to locate and sample one boring in this area.



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4. Based on the depiction of the PCE contamination, two borings may be warranted south of the existing NaOH tanks. If these borings are relatively close to the tanks, and metals are tested (in addition to the SWMU 17 chemicals of concern), the resulting data may help in addressing closure of this regulated unit. Also, the borings proposed inside the building seem relatively close to areas with known contamination. If conditions inside the building allow, it may be prudent to relocate these borings a bit farther away from the area of known contamination both to limit the number of borings necessary to define the extent of contamination and to minimize the potential to have to "step-out" to define such extent.

Boeing is hereby directed to submit a revised RFI Work Plan Addendum II to address the foregoing comments within 45 days of receipt of this letter.

If you have any questions concerning this letter or the comments contained herein, please do not hesitate to contact me at (573) 751-3553.

Sincerely,

HAZARDOUS WASTE PROGRAM



Patrick Quinn
Environmental Engineer
Permits Section

PQ:bi

c: Mr. Jeremy Johnson, U.S. EPA Region VII
St. Louis Regional Office